7:20-cv-00947-DCC Date Filed 02/20/23 Entry Number 275-10 Page 1 of 10

EXHIBIT J



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Documents

Privacy Policy — TrafficStars Privacy Policy — TrafficStars

Terms and conditions

EFFECTIVE DATE: JULY, 2017

Privacy Policy

LAST MODIFIED: JULY, 2017

Cookies Policy

WEBSITE(S) COVERED: TRAFFICSTARS.COM

DMCA Notice

Guidelines

Job Candidate Privacy Policy

1. Application of this policy

This Privacy Policy applies to TrafficStars LTD. only, ("TrafficStars" or "US"). TrafficStars LTD takes the privacy of your information very seriously. This privacy policy applies to our use of any and all Data collected by us or provided by you in relation to your use of the Website.

**Please read this privacy policy carefully. **It will tell you how and why we gather personal and non-personal information about you. TrafficStars Ltd. understands the importance of personal privacy and uses best practices to uphold this while using our website.

In accordance with the provisions of the Regulation (EU) 2016/679 of the European Parliament and the Council of April 27, 2016 (hereinafter, "GDPR"), all personal data provided by the Member to us through our website will be processed for the purposes indicated hereunder. Below is our privacy policy that

We use cookies to provide functionality our TrafficStars Sites, personalize content and advertisements, to enable social media functionality and analyze our traffic. View our Cookie Policy

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needs of the User.

Basic Information on Personal Data Protection for our Members and users navigating our website:

Basic information on personal data protection

| ----- Data Controller | TrafficStars Ltd. /124 Arch. Makariou III, Agrotis Court, 1st floor, 3021, Limassol, Cyprus/VAT: CY 99000138W/Registered at HE335138 Purpose | Provision of requested services (managing Member's account and requests) This information is used to provide any services requested and to optimize our website's technical usability and for internal research data. We also collect and use your data for the purpose of distributing our opt-in newsletters (when authorized by user) and to send promotions. Legal Basis | Data subject's consentWe may process your information because: We have a contract with you; You have given us permission to do so; We must provide services to you after you have purchased something from us; To comply with the law. Recipients | If provided to us by the Member by virtue of the rendered services, we do disclose information to advertisers and, when authorized by the Member, for other marketing and promotional purpose. TrafficStars Spain, S.L. for the purpose of marketing and promotions. State Agencies to comply with the law or other companies and organizations for fraud protection and credit risk reduction. Any other collaborators that may be necessary to provide the services, duly informing the Member, in accordance with the provisions of the GDPR. Rights | If provided to us by the Member by virtue of the rendered services, we do disclose information to advertisers and, when authorized by the Member, for other marketing and promotional purpose. TrafficStars Spain, S.L. for the purpose of marketing and promotions. State Agencies to comply with the law or other companies and organizations for fraud protection and credit risk reduction. Any other collaborators that may be necessary to provide the services, duly informing the Member, in accordance with the provisions of the GDPR. Detailed information | Access, rectification, erasure, objection, restriction of processing, data portability and not to be the subject of automated individual decisions. The right to withdraw consent. Contact the Supervisory Authority to file a claim.

2. Definitions and interpretation

In this privacy policy, the following definitions are used:

Data: means collectively all information that you submit to TrafficStars LTD via the Website. This definition incorporates, where applicable, the definitions provided in the Regulation (EU) 2016/679 on Data Protection (GDPR).

Cookies: means a small text file placed on YOUR computer by this Website when

connection with the provision of such services.

Website: the Website that you are currently using, trafficstars.com, and any subdomains of this website, unless expressly excluded by their own terms and conditions; In this privacy policy, unless the context requires a different interpretation:

the singular includes the plural and vice versa;

references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy;

a reference to a person includes firms, companies, government entities, trusts and partnerships;

"including" is understood to mean "including without limitation";

reference to any statutory provision includes any modification or amendment of it;

the headings and sub-headings do not form part of this privacy policy.

3. Scope of this privacy policy

This privacy policy applies only to the actions of TrafficStars LTD and Users with respect to this Website. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.

4. Collection and use of data

TrafficStars Ltd. may collect information from you because we have a legal reason (allowed by law or under contract) to collect the information, or because you have provided your consent for us to do so for a specific purpose.

TrafficStars Ltd. collects your name, email address, and other important information provided by you in order to provide any services requested. In addition, we collect credit card, and bank information from purchases made through TrafficStars Ltd. In the course of using our site, we automatically log information such as IP address, browser type, referrer and other technical data for internal use only. This information is used to optimize our website's technical usability and for internal research data. In addition, when you provide your consent, you agree to receive from us promotional or services related

themselves through the unsubscribe link at the bottom of all emails or contact us. You authorize TrafficStars Ltd., directly or through third parties, to make any inquiries we consider necessary to validate your identity. This may include asking you for further information that will allow us to reasonably identify you, requiring you to take steps to confirm ownership of your email address or financial instruments or verifying your Information against third party databases or through other sources. We may also ask to see your driver's licence or other government issued picture ID or any other identifying documents at any time, solely for identification purposes. TrafficStars Ltd. reserves the right to close, suspend, or limit access to your account in the event we are unable to obtain or verify this information. Furthermore, we may require information of a user of the website to employ you or consider you for employment or attend any request you may have on our services, at the careers section or the contact information section of our website. Any such personal data will solely be used for the aforementioned purposes.

Members will not provide sensible data (defined in art. 9 of Regulation (EU) 2016/679 on Data Protection (GDPR) which reveal racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation, or any data concerning a minor. In any case, TrafficStars Ltd. will not be held responsible for the information provided by the Members, and is exempted from the breach of these of the obligations established in the GDPR by Members.

5. Disclosure of your data

If provided to us by the User by virtue of the rendered services, we do disclose information to advertisers and, when authorized by the User, for other marketing and promotional purpose. Other than that, unless we are obliged or permitted by law to do so, and subject to any third party disclosures specifically set out in this policy, your Data will not be disclosed to third parties, except to State Agencies to comply with the law or other companies and organizations for fraud protection and credit risk reduction, to a prospective purchaser of our business or any part of it, and any other collaborators that may be necessary to provide the services, duly informing the User, in accordance with the provisions of the GDPR.

6. Data storage

The personal data you submit will be stored for 24 months or for as long as we may need to store such data according to legal provisions that requires the

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our products and services. We may process your information because we have a contract with you, you have given us permission to do so, must provide services to you after you have purchased something from us or to comply with the law.

8. Links to other websites

The legal basis of the processing of the User's data is addressing the requests of the User and to be able to keep him informed, even by electronic means, about our products and services. We may process your information because we have a contract with you, you have given us permission to do so, must provide services to you after you have purchased something from us or to comply with the law.

9. Changes of business ownership and control

TrafficStars LTD may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of TrafficStars LTD. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to us. In the above instance, we will take steps with the aim of ensuring your privacy is protected.

10. Functionality of the website

To use all features and functions available on the Website, you may be required to submit certain Data.

You may restrict your internet browser's use of Cookies. For more information see the clause below**(Cookies)**.

11. Accessing your own data and other rights

You have the right of access, so you may ask for a copy of any of your personal Data held by TrafficStars LTD (where such Data is held). We inform you that you have as well the possibility to exercise at any time and free of charge the rights of rectification, erasure, objection, restriction of processing, data portability and not to be the subject of automated individual decisions, the right to withdraw consent, by writing to support@trafficstars.com. In these cases, you must accompany a copy of your national Identification Card, passport or other valid document that identifies you in due manner. You may also contact the Supervisory Authority to file a claim.

and loss of the information under our control. We use industry standard efforts to safeguard the confidentiality of your personal identifiable information. We have implemented mechanisms to:

Ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services.

Restore the availability and access to personal data in a timely manner in the event of a physical or technical incident.

Regularly test, assess and evaluate the effectiveness of technical and organisational measures for ensuring the security of the data.

We will not retain your personal information for longer than required. We retain your personal data only for the time necessary to provide you with our services for legitimate and essential business purposes, until you request us to stop using it, and for as long as may be required by law.

TrafficStars Ltd. processes and stores your personal data within the EU/European Economic Area ("EEA"). Should we transfer your personal data outside the EEA it will be, either because, you have consented or because we have a legal reason to do so. In any case, if that is the case, any such processing shall be subject to the proper organizational and technical measures as required by GDPR (for instance, Standard Contractual Clauses, or Privacy Shield in the case of USA, as described hereunder). Some examples of reasons your data may be processed outside of the EEA include: Order Agreement fulfilment, payment processing, given the case, technical support services.

If your personal data could not be processed within the EEA, we will make sure to comply with all other data protection principles and

Where possible, be made to a country that is on the list of the EU Commissions' countries that provide adequate protections for the rights and freedoms of data subjects

The transfer is to the United States of America, we will use reasonable endeavours to make sure they participate in the Privacy Shield program. Sign the Standard Contractual Clauses when required to do so by GDPR.

13. California Consumer Privacy Act Notice

As of January 1, 2020, the California Consumer Privacy Act of 2018 ("CCPA") provides California residents ("Consumer(s)") certain rights with respect to their

Be informed of certain information concerning our collection and use of their personal information;

Request that we delete certain personal information we collected from them;

Appoint an agent to exercise their rights provided for by the CCPA, provided that a duly executed notarized power of attorney is presented and provided that the agent has information deemed sufficient to allow us to verify the identity of the Consumer in question and to locate his/her information in our systems;

Not be subjected to discrimination for the exercise of these rights. We will not deny California residents the use of our service, neither will we provide a different level or quality or services for exercising any of their CCPA rights, unless as permitted under the CCPA.

This Website does not sell nor has it sold in the past 12 months personal information to third parties for monetary or other valuable considerations. We may however disclose certain personal information with third parties, service providers and entities within our corporate group in order to enable them to perform certain services on our behalf and namely to make the Website work properly. Regardless, we respect the California residents' right to exclude personal information from such sharing arrangements and to thereby opt-out of any future sale of their personal information. If the CCPA is applicable to you and you would like to record such preference, please send us an email at support@trafficstars.com

14. Cookies

This Website may place and access certain Cookies on your computer. TrafficStars LTD uses Cookies to improve your experience of using the Website and to improve our range of services. TrafficStars LTD has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.

All Cookies used by this Website are used in accordance with current applicable laws.

Before the Website places Cookies on your computer, you will be presented with a message bar requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling TrafficStars LTD to provide a better experience and service to you. You may, if you wish, deny consent to the





believe your rights will not be affected.

If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.

Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.

This Agreement will be governed by and interpreted according to the laws of the Republic of Cyprus. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the Cypriot courts.

16. Changes to this privacy policy

We may change this policy as new services are added or old ones are changed. Such changes will be effective when a notice of the change is posted on the Site or sent to your email. Please check this Privacy Policy from time to time for updates on our website. We may e-mail periodic reminders of our policies and terms of use, but you should check our website frequently to see recent changes. Unless stated otherwise, our current Privacy Notice applies to all information that we have about you and your account. As we continue to develop our business, we might reorganize or transfer our business units or assets. In such transactions, user information generally is one of the transferred business assets but remains subject to the promises made in any pre-existing Privacy Notice unless the user consents otherwise. Also, in the unlikely event that TrafficStars Ltd. or substantially all of its assets are acquired, user information may be one of the transferred assets, without prejudice to applicable data protection requirements.

You may contact TrafficStars LTD by email at support@trafficstars.com



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costs, and automate media buys.

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